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Order Filed on February 25, 2025
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

-----X

IN RE:

CASE NO.: 25-10323-JNP

Daniel Torres,

CHAPTER 13

Debtor.

Judge: Jerrold N. Poslusny, Jr.

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**CONSENT ORDER RESOLVING CREDITOR'S OBJECTION TO
DEBTOR'S CHAPTER 13 PLAN**

The provisions set forth on the following pages, numbered two (2) through three (3), is hereby **ORDERED**.

DATED: February 25, 2025

A handwritten signature in dark ink, appearing to read "J. Poslusny", is written over a horizontal line.

Honorable Jerrold N. Poslusny, Jr.
United States Bankruptcy Court

Debtors: Daniel Torres
Case No.: 25-10323-JNP
Caption of Order: CONSENT ORDER RESOLVING CREDITOR'S OBJECTION TO
CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

THIS MATTER having been brought before the Court by Andrew Thomas Archer, Esquire, attorney for Debtor, Daniel Torres, upon filing of a Chapter 13 Plan (Doc.: 3); and Creditor, SN Servicing Corporation as Servicer for U.S. Bank Trust National Association, as Trustee of LB-Igloo Series IV Trust, by and through its attorneys, Friedman Vartolo, LLP, having objected to said Chapter 13 Plan; and the Court noting the consent of the parties to the form, substance, and entry of the within Order; and for good cause shown, it is hereby

IT IS HEREBY ORDERED as follows:


1. Secured Creditor agrees to a specified period of time to allow Debtor an opportunity to submit a Loss Mitigation application in connection with the mortgage loan secured by the real property located at 540 Diamond Spring Avenue, Lawnside, NJ 08045.
2. Debtor must submit a complete loss mitigation package to Secured Creditor by March 1, 2025. If the Debtor fails to submit a complete loss mitigation package by March 1, 2025, Secured Creditor may file a Certification of Default of this Order to terminate the automatic stay as to its interest in the aforementioned real property.
3. If the Debtor fails to obtain a loan modification by August 1, 2025, Debtor shall be required to file a Modified Chapter 13 Plan to fully cure Secured Creditor's pre-petition arrearages with remaining Chapter 13 Plan proceeds or otherwise satisfy Secured Creditor's pre-petition arrearages claim. Failure to file a satisfactory Modified Chapter 13 Plan within fourteen (14) days of the conclusion of the loss mitigation review shall entitle Secured Creditor to file a Certification of Default of this Order to terminate the automatic stay as to its interest in the aforementioned real property. If the loss mitigation review remains pending, Debtors and/or Secured Creditor may submit an Application to this Court to extend the August 1, 2025 deadline referenced in this paragraph.
4. Starting February 1, 2025, Debtor agrees to maintain regular monthly payments to Secured Creditor until completion of the Loss Mitigation review. If the Debtor fails to make any regular mortgage payment(s) within thirty (30) days of the due date, Secured Creditor may file a Certification of Default of this Order to terminate the automatic stay as to its interest in the aforementioned real property.
5. Secured Creditor's Objection to Confirmation of Plan (Doc.: 13) is hereby resolved by this Order.
6. This Order shall be incorporated in and become part of any Order Confirming Plan in the herein matter.

The undersigned hereby consent to the form and entry of the within Order:

Date: 2/24/2025

/s/ Charles Wohlrab
Charles Wohlrab, Esquire
Friedman Vartolo, LLP
Counsel for Creditor

Date: 2/13/25


Andrew Thomas Archer, Esquire
Brenner Spiller & Archer
Counsel for Debtor

In re:
Daniel Torres
Debtor

Case No. 25-10323-JNP
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0312-1
Date Rcvd: Feb 26, 2025

User: admin
Form ID: pdf903

Page 1 of 2
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Feb 28, 2025:

Recip ID	Recipient Name and Address
db	+ Daniel Torres, 32 Berkshire Drive, Sewell, NJ 08080-3103

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Feb 28, 2025

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on February 26, 2025 at the address(es) listed below:

Name	Email Address
Andrew B Finberg	ecfmail@standingtrustee.com ecf.mail_9022@mg.bkdocs.us
Andrew Thomas Archer	on behalf of Debtor Daniel Torres aarcher@spillerarcherlaw.com bankruptcy@brennerlawoffice.com;mcdoherty_187750@ecf.courtdrive.com
Charles G. Wohlrab	on behalf of Creditor SN Servicing Corporation as Servicer for U.S. Bank Trust National Association as Trustee of LB-Igloo Series IV Trust bkecf@friedmanvartolo.com, cwohlab@ecf.courtdrive.com
Denise E. Carlon	on behalf of Creditor MIDFIRST BANK dcarlon@kmlawgroup.com bkgroup@kmlawgroup.com
U.S. Trustee	USTPRegion03.NE.ECF@usdoj.gov

District/off: 0312-1

User: admin

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Date Rcvd: Feb 26, 2025

Form ID: pdf903

Total Noticed: 1

TOTAL: 5